

UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE

EXHIBIT
P

Jonathan Leite,
Plaintiff

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v.

* Civil No. 15-cv-00280-PB

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Matthew Goulet *et al.*,
Defendants

AFFIDAVIT OF MICHAEL BEATON

I, Michael Beaton, upon oath do hereby depose and state as follows:

1. I am presently employed by the New Hampshire Department of Corrections at the Northern New Hampshire Correctional Facility (“NCF”). I make this affidavit based on my personal knowledge.
2. My job responsibilities at NCF on August 24, 2012 did not involve conducting rounds or counts on F-block. I did not participate in any rounds or counts on F-block on that day.
3. At no point on August 24, 2012 did I view any video footage of the F-block housing unit that caused me any concern for the safety of the inmates within that unit.
4. At no point on or prior to August 24, 2012 was I informed by an inmate Leite or any other individual that Leite or any other individual was at risk of an assault or any other harm.
5. I also did not work in the NCF visiting room on August 24, 2012, and, therefore, I did not participate in post-visit searches of inmates on that date.
6. I declare under the penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Date: October 12, 2017

s/ Michael Beaton
Michael Beaton